

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Tiffany Robinson,)	
)	
Plaintiff,)	
)	No. 08 C 185
v.)	Hon. Ronald A. Guzman
)	
H&R Block, Inc. and HSBC Bank USA, N.A.,)	
)	
Defendants.)	

JOINT INITIAL STATUS REPORT

A. Nature of the Case Plaintiff Tiffany Robinson brings this action to secure redress for the alleged actions of defendants H&R Block, Inc. ("H&R Block") and HSBC Bank USA, N.A. ("HSBC"). Plaintiff asserts a claim for common law invasion of privacy, as well as claims based on alleged violations of the Fair Credit Reporting Act, the Truth in Lending Act, the Equal Opportunity Credit Act, and the Illinois Consumer Fraud Act.

- Bases for jurisdiction, nature of the claims and counterclaims. Plaintiff alleges that this Court has federal question subject matter jurisdiction. There is currently no counterclaim. H&R Block, Inc. has filed a motion to dismiss for lack of personal jurisdiction on the basis that there is neither specific or general jurisdiction over the entity named in this case.

- Major legal issues. Whether defendants' actions constitute violations of the FCRA, ECOA, TILA and ICFA. Whether H&R Block, Inc. is subject to this Court's jurisdiction and/or otherwise improperly named in this suit. Whether defendants are accountable for alleged fraudulent conduct of a non-party. Whether the remedies sought are recoverable and appropriate in this case. Whether defendants' affirmative defenses bar plaintiff's claims and/or requests for relief.

- Major factual issues. The factual details surrounding Plaintiffs' allegations that an H&R Block employee misappropriated plaintiff's pay stub information and applied for a loan on her behalf, and that plaintiff's application for a loan was improperly processed, including each defendant's involvement in and knowledge of the alleged misconduct. Whether plaintiff sustained any damages as a result of these alleged actions, and, if so, the extent of such damage.

B. Proposed Discovery Schedule. The parties agree and jointly propose that a discovery schedule should not be entered until the Court resolves the pending motion to dismiss for lack of personal jurisdiction. In the alternative, if the Court requires that a scheduling order be entered at this time, the parties jointly propose the scheduling order include the following dates.

- Rule 26(a)(1) disclosures due April 11, 2008.
- join other parties and to amend the pleadings; May 1, 2008.
- discovery cutoff - September 30, 2008.
- summary judgment motions due by November 30, 2008.
- With the exception of a likely confidentiality and protective order, which the parties intend to submit by stipulation, the parties are not aware of any other orders that the Court should enter under Fed. R. Civ. P. 26(c).

C. Trial Status

- Whether or not a jury has been requested. Plaintiff has requested a jury.
- Probable length of the trial. The trial will likely last three days.

D. Consent to Proceed Before a Magistrate Judge The parties do not unanimously consent to the jurisdiction of a Magistrate Judge.

E. Settlement Status

- Whether or not settlement discussions have been held and the status of those discussions, if any. Plaintiff and HSBC have had initial settlement discussions.

Respectfully submitted,

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CERTIFICATE OF SERVICE THROUGH ELECTRONIC MEANS

I hereby certify that on March 7, 2008, I caused a true and correct copy of the foregoing to be served upon the individuals listed above via ECF electronic delivery.

/s/Keith J. Keogh